

NORTHROP GRUMMAN

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July 1, 2011

Ray Strickland
Environmental Engineer
United States Environmental Protection Agency
Superfund Enforcement and Information Management Branch
61 Forsyth Street SW
Atlanta, GA 30303

RE: CTS of Asheville, Inc. Superfund Site (formerly known as Mills Gap Groundwater Contamination Superfund Site)
Asheville, Buncombe County, North Carolina

Dear Mr. Strickland:

I write on behalf of Northrop Grumman Systems Corporation (successor-in-interest to Northrop Grumman Space & Mission Systems Corp., which was formerly known as TRW Inc.) ("NGSC") in response to U.S. EPA's information request sent to Mr. Lewis W. Coleman of Northrop Grumman Corporation, dated May 2, 2011 ("Second Information Request"), concerning the CTS of Asheville, Inc. Superfund Site (the "Site"). As confirmed by email correspondence from Ms. Lisa Ellis of USEPA, dated June 6, 2011, USEPA agreed that the due date for this Response is July 1, 2011.

As way of background, please note that NGSC previously responded to USEPA's First Information Request regarding the Site on October 4, 2002. In addition, in response to USEPA's threat of issuance of a Unilateral Order, in a letter to Mary Johnson of USEPA dated July 18, 2003 and accompanying Supporting Legal Memorandum, NGSC fully briefed its position that it is not a liable party under CERCLA for this Site because: (1) mere ownership/operation of an electroplating business and use of TCE does not establish that disposal of a hazardous substance occurred during ownership/operation of the Site by IRC Corp. (IRC was merged into TRW Inc. ("TRW") in 1967) as required to impose liability pursuant to CERCLA Section 107(a)(2), and (2) CTS Corp., not NGSC, would be the appropriate responsible party as a successor-in-interest to IRC for releases during IRC's ownership and operation of the Site, if any were established. In response, USEPA relayed to NGSC on or about September 15, 2003 via a voice message from Mary Johnson to Valerie Hanna, NGSC counsel, that USEPA was no longer going to pursue an enforcement action against NGSC or issue a Unilateral Order to NGSC for the Site. NGSC urges USEPA to review these materials.

General Objections

NGSC asserts the following general objections to USEPA's Second Information Request:

1. NGSC objects to the definition of "You" or "Respondent", as these terms are mischaracterized in the Definitions section of the Second Information Request. Northrop Grumman Corporation was **NOT** formerly known as Northrop Grumman Space & Mission Systems. TRW Inc.'s name was changed in 2002 to Northrop Grumman Space & Mission Systems Corp. In 2010, Northrop Grumman Systems Corporation became the successor-in-interest to Northrop Grumman Space & Mission Systems Corp. Northrop Grumman Systems Corporation is a wholly-owned subsidiary



of Northrop Grumman Corporation. These Responses are submitted on behalf of Northrop Grumman Systems Corp. ("NGSC")

2. NGSC objects to individual information requests because they are vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's responses are limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

EPA Requests and NGSC's Responses

General Response to Information Requests

NGSC states that, to the best of its information and belief, the facility was a new facility at the time IRC, Inc. ("IRC") operated at the Site location. IRC acquired the property and a partially constructed building at the Site location in 1952. IRC completed construction of the building and commenced metal plating operations at the Site at some point after spring 1953. IRC ceased all operations at the Site and sold the entire business that was conducted at the Site to Chicago Telephone Supply Corporation ("CTS") in 1959. Eight years later, IRC was merged into TRW pursuant to an Agreement of Merger dated November 28, 1967. Properties owned or leased by IRC at the time of the merger with TRW did not include any property in Buncombe County, North Carolina. The IRC business became part of TRW's Resistive Products Division, which was formed in 1968 upon TRW's acquisition of IRC. In 1986, TRW sold the assets of its Resistive Products Division to Crystalate Holdings plc ("Crystalate") pursuant to an Agreement of Purchase and Sale dated October 14, 1986. To the best of our information and belief, documents related to the business were transferred to Crystalate.

All responsive documents supporting the information provided in this General Response have previously been provided to USEPA. Documentation relating to the dates of IRC's construction and operation of the facility at the Site, and subsequent sale of the business to CTS was provided to USEPA in CTS's Response to USEPA's First Information Request (dated August 16, 2002) and in the April 8, 1959 Purchase Agreement entered between IRC and CTS, which was provided to USEPA in NGSC's Response to USEPA's First Information Request, dated October 4, 2002 ("First Information Request"). The details of the sale of the business to CTS are further summarized in letter from Valerie Hanna of NGSC to Mary Johnson of USEPA, dated July 18, 2003. All relevant and available documentation relating to the merger between TRW and IRC and the sale between TRW and Crystalate was provided to USEPA in NGSC's Response to USEPA's First Information Request. If USEPA would like NGSC to forward a copy of any of these documents, please let me know.

Accordingly, NGSC has not located documents in its possession, custody or control regarding any property in Buncombe County allegedly owned or operated by IRC. As provided above, IRC sold the business and assets once operated at the Site to CTS in 1959, eight years before the merger between TRW and IRC. As such, TRW has no independent knowledge or information, except as stated below, regarding operations at the Site.

On or about May 7, 2003, NGSC counsel conducted informal telephone interviews of the following two witnesses who USEPA had identified as former IRC employees:

Norman Lewis

Last known contact information (as provided by Mary Johnson of USEPA in 4/17/03 email correspondence):

(b) (6)

(b) (6)

Last known contact information (as provided by Mary Johnson of USEPA in 4/17/03 email correspondence):

(b) (6)

A summary of the information obtained from these witnesses is provided below. NGSC notes that it has not been able to independently verify (due to the lack of documentation in its possession) the statements made during these interviews, and the interviews were not taken under oath or transcribed. It is NGSC's understanding that USEPA also previously conducted interviews of these witnesses.

Informal Interview of (b) (6) – The summary of information set forth below is based on statements made by (b) (6) during the May 7, 2003 informal telephone interview, as documented by notes taken at the time of the interview by NGSC counsel. To the best of NGSC's information and belief, the statements below are based on (b) (6)'s observations and knowledge during his tenure at the Site.

- (b) (6) worked at the Site from the time it opened in 1953 until CTS purchased the business, except for the time starting in 1956 when he was serving in the armed forces.
- (b) (6) was a material handler and worked in the plating room.
- The floor trenches in the plating room were brick-lined and drained to the sanitary sewer.
- Bare earth could not be seen at the bottom of the floor trenches in the plating room.
- The materials collect in these trenches consisted of rinse water and soaps from the plating operations.
- Trichloroethylene ("TCE") was used for the degreasing of parts that were to be plated.
- The degreasing operation, consisting of a vapor degreaser, was located immediately outside the door of the plating room.
- Parts were cleaned and rinsed after they were removed from the degreaser.
- The degreaser fluid was brought onsite in 55 gallon barrels.
- The spent degreaser fluid was shipped offsite in 55 gallon barrels for recycling. (b) (6) could not recall what company managed the spent degreaser fluid.
- There were no underground tanks, no "TCE Pit", no TCE tanks, no onsite disposal of materials, and no painting at the facility.

Informal Interview of (b) (6) – The summary of information set forth below is based on statements made by (b) (6) during the May 7, 2003 informal telephone interviews, as documented by notes taken at the time of the interview by NGSC counsel.

- (b) (6) worked at the facility beginning in 1953 when the facility first began operation for about 30 years, and was originally employed by IRC and then by CTS.

- (b) (6) was a tool and die maker, and had no involvement with the plating line when he worked for IRC.
- The plating line was in a walled-off room which contained floor trenches, which (b) (6) recalls being made of concrete.
- A vapor degreaser was located outside of the plating room in a separate walled-off room.
- The degreaser was filled via barrels.
- Mr. Anders did not recall a "pit" or a painting line, but does recall a tank cradle which was not originally at the Site at the beginning of the facility operations. He did not know what was in the tank.
- (b) (6) did not recall any outside disposal or spills/leaks.
- Housekeeping was good.
- A building addition was added on in later years to house the punch press operated by CTS.

Response to Information Request 1.a.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to disposal, treatment, unloading, management or handling of hazardous substances at, to or from the Site.

Response to Information Request 1.b.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to disposal, treatment, unloading, management or handling of hazardous substances at, to or from the Site or at a different location than what was originally intended.

Response to Information Request 1.c.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to transshipments or storage of hazardous substances at, to or from the Site.

Response to Information Request 1.d.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to the chemical nature or quantity of hazardous substances related to the Site.

Response to Information Request 1.e.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to the chemical nature or quantity of non-hazardous substances related to the Site.

Response to Information Request 1.f.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to the condition of any material containing a hazardous substance that was transferred to or from the Site.

Response to Information Request 1.g.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to containers of hazardous materials at or from the Site.

Response to Information Request 1.h.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to tests, analytical results or manifests for hazardous substances related to the Site.

Response to Information Request 1.i.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to disposition of hazardous substances at or from the Site.

Response to Information Request 1.j. (including subpart i-vi)

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to arrangements for disposal, treatment, or transportation of hazardous substances at or to the Site.

Response to Information Request 1.k.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to who controlled/transported hazardous substances prior to delivery to the Site.

Response to Information Request 1.l.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to owners/possessors of hazardous substances at or to the Site.

Response to Information Request 1.m.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to selection of the location where hazardous substances at the Site were to be treated/disposed.

Response to Information Request 1.n.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to how hazardous substances or materials containing hazardous substances were planned to be used at the Site.

Response to Information Request 1.o.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to what was done with hazardous substances once brought to the Site.

Response to Information Request 1.p.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to activities or common business practices conducted at the Site or any facility where hazardous substances were sent from the Site.

Response to Information Request 1.q.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to how hazardous substances were used, handled or disposed of at the Site.

Response to Information Request 1.r.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, NGSC states that, to the best of its information and belief, IRC owned or operated the Site from 1952 until 1959, at which time it sold the entire business that was conducted at the Site to CTS. Eight years later, IRC was merged into TRW pursuant to an Agreement of Merger dated November 28, 1967. See also General Response to Second Information Request.

Response to Information Request 1.s.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to waste disposal activities at the Site.

Response to Information Request 1.t.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to hazardous substances that were sent to the Site.

Response to Information Request 1.u.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to steps taken to dispose of or treat hazardous substances at the Site.

Response to Information Request 1.v.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to selection of means and method of disposal or treatment of hazardous substances at the Site.

Response to Information Request 1.w.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to the transfer of hazardous substances to or from the Site.

Response to Information Request 1.x.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to transactions involving hazardous substances at the Site.

Response to Information Request 1.y.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to the selling, transferring, delivering, disposing of, or arranging for the treatment or disposal of hazardous substances to or at the Site.

Response to Information Request 1.z.

NGSC objects to this information request because is vague as to the entity and/or site relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to shrinkage/spillage provisions or loss allowance at the Site.

Response to Information Request 2.

NGSC objects to this information request because is vague as to the entity relating to the information sought, as it refers to "Company X", rendering a response impractical. NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it is its understanding that in or about 2003, USEPA had identified and spoken with two additional former employees of CTS (but not IRC) that may have relevant information about the Site, including:

(b) (6)

(b) (6)

Tom Israel (not located by USEPA)

NGSC states that the contact information provided for the individuals above is based on information provided by Mary Johnson of USEPA in 4/17/03 email correspondence. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to other IRC employees knowledgeable about the hazardous substances at the Site during IRC's operations.

Response to Information Request 3.

NGSC objects to this information request because is vague as it does not define "the drums" referenced in the Information Request, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s operations at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to drums or hazardous substances sent, brought, or moved to the Site during IRC's operations at the Site.

Response to Information Request 4.

NGSC objects to this information request because is vague as to the facility relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to a schematic diagram or flow chart of IRC's operations at the Site.

Response to Information Request 5.

NGSC objects to this information request because is vague as to the facility relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that based on its best information and belief, IRC produced general purpose variable resistor products, switches, accessories and parts at the Site, and processes included degreasing and plating of parts at the Site. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to the nature of IRC's operations at the Site.

Response to Information Request 6.

NGSC objects to this information request because is vague as to the facility relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to changes in IRC's operations at the Site.

Response to Information Request 7.

NGSC objects to this information request because is vague as to the facility relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that based on its best information and belief, IRC produced general purpose variable resistor products, switches, accessories and parts at the Site, and processes included degreasing and plating of parts at the Site. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to raw materials used in IRC's operations at the Site.

Response to Information Request 8.

NGSC objects to this information request because is vague as to the facility relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to MSDSs for materials used by IRC at the Site.

Response to Information Request 9.

NGSC objects to this information request because is vague as to the facility relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to cleaning and maintenance of equipment and machinery involved in IRC's operations at the Site.

Response to Information Request 10.

NGSC objects to this information request because is vague as to the facility relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to any spills of liquids or solid materials or methods used to clean up the same during IRC's operation at the Site.

Response to Information Request 11.

NGSC objects to this information request because is vague as to the facility relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to substances present in IRC's wastes or by-products at the Site.

Response to Information Request 12.

NGSC objects to this information request because is vague as to the facility relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to wastes generated from IRC's operations at the Site.

Response to Information Request 13.

NGSC objects to this information request because is vague as to the facility relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to schematic diagrams of IRC's operations that generated wastes at the Site.

Response to Information Request 14.

NGSC objects to this information request because is vague as to the facility relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to IRC Inc.'s involvement at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see General Response to Second Information Request. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to collection or storage of wastes from IRC's operations at the Site.

Response to Information Request 15.

NGSC objects to this information request because is vague as to the entity relating to the information sought, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to insurance coverage for liabilities of IRC Inc. related to the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, NGSC states that it does not have in its possession, custody or control responsive information or documentation relating to insurance policies or contracts referencing the Site.

Response to Information Request 16.

NGSC objects to this information request because it seeks policies that are not related in any manner to the Site, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to insurance coverage for liabilities of IRC Inc. related to the CTS of Asheville, Inc. Superfund Site. NGSC further objects to this request to the extent it calls for a legal conclusion.

Without waiving these objections, NGSC states that it does not have in its possession, custody or control responsive information or documentation relating to insurance policies or contracts issued to IRC. NGSC further states that insurance policies issued to TRW prior to the inclusion of the standard pollution exclusion clause(s) are in the process of being researched, and this Response will be supplemented once this activity is completed. NGSC further states that, based on its best information and belief, future recover under any relevant TRW policies is subject to global settlement agreements with the insurers (see Response to Information Request 20), and thus, they are no longer viable as concerns the Site.

Response to Information Request 17.

See Response to Information Request 16. NGSC states that it does not have in its possession, custody or control any additional responsive information or documentation relating to casualty or pollution insurance issued to IRC for the period of IRC's ownership of the Site.

Response to Information Request 18.

See objections in Responses to Information Requests 15, 16, and 17. Without waiving these objections, see Response to Information Request 16. NGSC further states that it is not aware of any such policies that are not in its current possession.

Response to Information Request 19.

NGSC objects to this information request because it purports to seek information for a time period beyond IRC's ownership/operation at the Site in that IRC sold the Site and ceased operations at the Site prior to its merger with TRW/Respondent, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to the time period of IRC Inc's ownership/operation of the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, NGSC states that it does not have in its possession, custody or control responsive information or documentation relating to insurance brokers or agents who placed insurance for IRC at the time of its ownership of the Site.

Response to Information Request 20.

See objections in Response to Information Request 16. Without waiving this objection, NGSC states that, to its best information and belief, all potentially relevant insurance policies issued to TRW prior to the inclusion of the standard pollution exclusion clause(s) are subject to settlements with the insurers. Copies of the CONFIDENTIAL Settlement Agreements, which provide the date of settlement, scope of the release and the settlement amount, are in the process of being compiled, and this Response will be supplemented once this activity is completed.

Response to Information Request 21.

NGSC objects to this information request because it seeks information that is not related in any manner to the Site and/or which extends beyond IRC Inc.'s ownership/operation of the Site, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to claims for insurance coverage made by IRC Inc. during its operation of the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, see Response to Information Request 16. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to insurance claims made by IRC relating to the Site.

Response to Information Request 22.

NGSC objects to this information request because it seeks information that is not related in any manner to the Site and/or which extends beyond IRC Inc.'s ownership/operation of the Site, rendering a response

impractical. Unless otherwise stated, NGSC's response is limited to policies covering IRC liabilities at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, all known policies potentially covering IRC liabilities at the Site are addressed in Response to the Information Request 16, and this Response will be supplemented as stated therein. NGSC further states that it does not have in its possession, custody or control any additional responsive information or documentation relating to policies covering IRC liabilities at the CTS of Asheville, Inc. Superfund Site.

Response to Information Request 23.

NGSC objects to this information request because it seeks information that is not related in any manner to the Site and it purports to seek information for a time period beyond IRC's ownership/operation at the Site in that IRC sold the Site and ceased operations at the Site prior to its merger with TRW/Respondent, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to policies covering IRC liabilities at the CTS of Asheville, Inc. Superfund Site.

Without waiving this objection, NGSC states that it does not have in its possession, custody or control responsive information or documentation relating to named insureds on property, pollution or casualty insurance policies issued to IRC for liabilities at the CTS of Asheville, Inc. Superfund Site.

Response to Information Request 24.

NGSC objects to this information request because it seeks information that is not related in any manner to the Site and it purports to seek information for a time period beyond IRC's ownership/operation at the Site in that IRC sold the Site and ceased operations at the Site prior to its merger with TRW/Respondent, rendering a response impractical. Unless otherwise stated, NGSC's response is limited to policies covering IRC liabilities at the CTS of Asheville, Inc. Superfund Site.

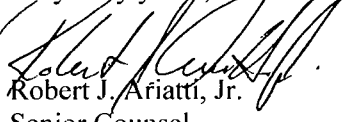
Without waiving this objection, NGSC states that it does not have in its possession, custody or control responsive information or documentation relating to persons or organizations requiring evidence of casualty, liability, or pollution insurance issued to IRC for liabilities at the CTS of Asheville, Inc. Superfund Site.

Conclusion

NGSC has attempted to fully and diligently respond to this Second Information Request by searching appropriate subject matter files in its possession, custody or control, but we reserve our right to supplement this response if additional information comes to light.

Please call or email if you have any questions. (Cell: 228-327-3827; Office: 703-549-1500)

Very truly yours,


Robert J. Ariatti, Jr.
Senior Counsel
Northrop Grumman Corporation